

R08-19-A-007

Fort Belknap Community Economic Development Corporation

143 Assiniboine Avenue

P.O. Box 1177

Harlem, MT 59526

Executive Director: (406) 353-4260

Tourism Director: (406) 301-3045

FY19 BROWNFIELDS ASSESSMENT GRANT Narrative Information Sheet

1. Applicant Identification:

Fort Belknap Community Economic Development Corporation
143 Assiniboine Avenue
P.O. Box 1177
Harlem, MT 59526

2. Funding Requested

a. **Assessment Grant Type:** Community-Wide

b. **Federal Funds Requested**

i. **Requested Amount:** \$300,000

ii. **Site-Specific Assessment Grant waiver of \$200,000 limit:** N/A

c. **Contamination:** Hazardous Substances

3. **Location:** Fort Belknap Reservation

4. **Property Information for Site-Specific Proposals:** N/A

5. Contacts

a. **Project Director:**

Leslie "Josie" Cliff

Executive Director

143 Assiniboine Avenue

P.O. Box 1177

Harlem, MT 59526

(406) 353-4260

(b) (6)

b. **Chief Executive/Highest Ranking Elected Official**

Leslie "Josie" Cliff

Executive Director

143 Assiniboine Avenue

P.O. Box 1177

Harlem, MT 59526

(406) 353-4260

(b) (6)

6. **Population:** 3,049

7. Other Factors Checklist

Other Factors Checklist		
	Other Factor	Page #
	<i>None of the Other Factors are applicable.</i>	
X	Community Population is 10,000 or less.	Narrative Info Sheet
X	Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1
	The priority brownfield site(s) is impacted by mine-scarred land.	
	The priority site(s) is adjacent to a body of water (i.e. the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
	The priority site(s) is in a federally designated flood plain.	
X	The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	3
	30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	

8. **Letter from the State or Tribal Environmental Authority:** A letter from Fort Belknap Indian Community is attached.

Narrative Information Sheet Attachment

Letter from Fort Belknap Indian Community

Fort Belknap Indian Community



Fort Belknap Agency
656 Agency Main Street
Harlem, Montana 59526-9455
PH: (406) 353-2205
FAX: Council - (406) 353-4541
FAX: Departments - (406) 353-2797

Fort Belknap Indian Community
(Tribal Govt.)
Fort Belknap Indian Community
(Elected to administer the affairs of the community and
to represent the Assiniboiné and the Gros Ventre
Tribes of the Fort Belknap Indian Reservation)

January 15, 2019

Ms. Josie Cliff, Executive Director
Fort Belknap Community Economic Development Corporation
EPA Brownsfield Program
P.O. Box 1177
Harlem, MT 59526

Dear Ms. Cliff:

On behalf of the Fort Belknap Indian Community Council it gives me great pleasure to write this letter of support for the FY19 Brownsfields Assessment Project that is being submitted by the Fort Belknap Community Economic Development Corporation. Housing needs of Tribal members here at Fort Belknap is one of our highest needs as identified by our Tribal Housing Authority staff and most recently within our Strategic Planning sessions that were conducted with Tribal Council members. The need for additional homes on Fort Belknap will provide community residents with homes as currently we have over 300 individuals on our waiting list for homes here at Fort Belknap. Our situation here now is that we have multi-families living in one unit and available homes is a great necessity for these families.

This letter is to inform the funding agency that the Tribal Council is fully committed to this program for the assessment and rehabilitation of the Malmstrom Air Base homes that were purchased a few years ago will be the ideal project once completely rehabilitated. Once completed these homes will be placed on the Eagle Valley Estates housing project at the Agency and would be a fantastic addition to the site but most importantly homes will be available to our community residents.

We are collaborating with a number of tribal programs including the Tribal Housing Authority, Prairie Mountain Utilities, Operation Walking Shield, and Island Mountain Development Group along with other tribal programs to make this project a success.

Again, the Fort Belknap Indian Community Council strongly supports this Brownsfield Assessment Project and look forward in making this project a great success. If I can be of further assistance please call me at your convenience.

Sincerely,

Andrew Werk, Jr., President
Fort Belknap Indian Community

RANKING CRITERIA

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area: The Fort Belknap Community Economic Development Corporation (FBCEDC) is applying for a \$300,000 hazardous substance assessment grant to assess vacant homes on the Fort Belknap Indian Reservation. FBCEDC was established in 2014 by the Fort Belknap Indian Community Council to build a strong community through business, entrepreneurship, and community development. Established in 1888, the Fort Belknap Indian Reservation (Reservation) is home to the Assiniboine (Nakoda) and Gros Ventre (Aaniiih) Tribes. The Fort Belknap Indian Community has a tribal membership of approximately 6,700 enrolled members, of which about 3,000 live on the Reservation.¹ The Reservation encompasses 675,147 acres about 40 miles south of the Canadian border in north central Montana. The land is mostly rolling hills with the Little Rocky Mountains at the southern end of the Reservation. Historically, the Gros Ventre and Assiniboine were nomadic hunters and warriors following the buffalo which provided them the necessities of life. Today, the main industry on the Reservation is agriculture, consisting predominantly of the operation of small cattle ranches, irrigated alfalfa fields, and dry-land farming.

The target area for our brownfields assessment activities is Fort Belknap Agency, the largest of four communities within the Reservation. Fort Belknap Agency has a population of about 1,400 people² and is the home of the Tribal Government and primary Tribal services. Most residents on the Reservation do not have the funds to maintain, renovate, or own homes on the Reservation. With few commercial businesses and the isolated nature of the reservation, only 29% of the population on the Reservation is employed. As a result, numerous homes are vacant, uninhabitable, and believed to be contaminated with asbestos, lead-based paint, and meth. At last count, nearly 300 families were on a waiting list for homes, and no habitable homes are currently available. An additional 200 homes are considered overcrowded. Brownfields assessment grant funding is needed to assess, clean up, and reuse its existing housing inventory and to address the severe housing shortage plaguing the Gros Ventre and Assiniboine tribes.

ii. Description of the Priority Brownfield Site(s): Based on a survey conducted in early 2017 by FBCEDC, 109 vacant houses are located on the Reservation. In 2013, Fort Belknap Community Council entered into an agreement with the U.S. Government to acquire Malstrom Air Force Base houses for potential renovation into tribal housing. After the homes were transported to Fort Belknap Indian Community, the Housing Authority realized the homes likely contained asbestos and could not be renovated without first assessing the homes. For the past five years, these “runway homes” have sat on blocks in the middle of the Fort Belknap Indian Community’s only airport runway. These homes block the runway from being used and prevent emergency flights from coming into Fort Belknap Agency. Though structurally sound, the homes possibly contain meth, asbestos and lead-based paint, and assessment of them is needed before determining which ones to renovate. Transients have been seen living in the homes despite

¹<http://www.montana.edu/extensionecon/countydata/FortBelknap.pdf>

²<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

potential human health threats. Each home is approximately 1,400 square feet and 3-4 bedrooms. These homes are a priority for assessment and redevelopment because homes of this size and general quality are limited on the Reservation. Reuse of the “runway homes” will help address the 300 families on the housing waiting list. After assessment, cleanup and renovations, the homes will be moved to the new Eagle Valley Estates development.

b. Revitalization of the Target Area

i. Redevelopment Strategy and Alignment with Revitalization Plans: We are developing a 160-unit subdivision of residential and commercial lots called Eagle Valley Estates located on the west edge of Fort Belknap Agency. Since 2008, Eagle Valley Estates has been a mixed-use housing development project supported by local, community, tribal, state and federal partners. The development is now part of the Fort Belknap 2018 Strategic Plan as well as the 2017 Comprehensive Economic Development Strategy (CEDS) report. The CEDS ranked housing at the top of the list for needs on the Reservation with more than 300 families on the waiting list for housing. The Fort Belknap Indian Community has a 10-year goal to increase home ownership on the Reservation³. Eagle Valley Estates, when fully developed, will include four parks, a walking trail, paved streets with sidewalks, curb and gutter, and water and sewer. The Fort Belknap Indian Community developed a site plan using a \$5,000 grant from the Montana Department of Natural Resources and Conservation. Through the Department of Defense’s Innovative Readiness Training Program, the Naval Mobile Construction Battalion 133 spent six weeks at Eagle Valley Estates to begin earth work for roads and future home sites. The next steps include assessing the runway homes, completing remediation and renovation based on a triage process, and moving them to Eagle Valley Estates. The hope is all the runway homes will require limited cleanup and renovation, but more likely some will be good candidates for future housing and others not due to the level of contamination and the degree of dilapidation. Prior to assessments, a general walkthrough of each home will be completed to evaluate their overall soundness and potential for reuse. Once assessments are complete, the effort needed to remediate them will be evaluated. Those easiest to cleanup and renovate (hoping all 30) will be used in the subdivision. Island Mountain Development Group (Island Mountain), a business entity of the Fort Belknap Indian Community, will lease the residential lots from the Tribes and purchase the runway homes for approximately \$12,000 each. After renovation, currently estimated at \$40,000 per home, the homes themselves will be relocated to Eagle Valley Estates and sold for about \$65,000 to enrolled tribal members. Island Mountain will carry the mortgages for qualified buyers.

ii. Outcomes and Benefits of Redevelopment Strategy: By assessing the runway homes, we will be potentially identifying 30 healthy homes for families who otherwise are without a home. Safe housing is a critical necessity to achieve improved health and welfare on the Reservation. For us, creation of safe housing is also economic development on the Reservation. Island Mountain did a survey of persons employed on the Reservation that showed a majority of employees have a difficult time maintaining employment due to the fact they cannot find suitable housing on the Reservation. The development of Eagle Valley Estates will create safe, clean living spaces for residents, encourage employment, and help homeowners build equity in their homes. Owning a home and building equity encourages the homeowner to maintain the home. Families will have

³ Fort Belknap Indian Community Comprehensive Economic Development Strategies, 2017-2022

access to greenspace including four new parks, a walking path and children's playground in the subdivision. In addition, the property in the center of the development will be used for solar power for the housing development, reducing the financial burden on residents and furthering green development initiatives. Relocation of the runway homes will also allow the airport runway to be used again for emergency flights. Funding of the grant will result in the hiring of two environmental technicians employed by FBCEDC to help with assessment activities.

c. Strategy for Leveraging Resources

- i. Resources Needed for Site Reuse: FBCEDC regularly partners with the Tribes to complete projects on the Reservation, as proposed on this project. Because FBCEDC is a registered 501(c)(3) non-profit and the Tribe is a sovereign nation, we are eligible for a variety of grants to meet our redevelopment goals on this project. The Tribes received a \$5,000 grant from the Montana Department of Natural Resources and Conservation to develop a site plan for Eagle Valley Estates. The Tribes also received in-kind assistance totaling \$650,000 through the Department of Defense Innovative Readiness Training Program. The Naval Mobile Construction Battalion 133 moved over 40,000 cubic yards of soils, established 27 house pads, four roads, and two alleys to initiate the Eagle Valley Estates project.⁴ To continue site development, the Fort Belknap Housing Authority plans to apply for a HUD Community Development Block Grant to help cover infrastructure costs and FBCEDC recently apply for a HUD Indian Community Development Block Grant for site development. We also anticipate that a portion of the funding for water and sewer at Eagle Valley Estates will likely come from the Fort Belknap Indian Water Rights Settlement that provides monies from the federal and state government for water projects. After assessment activities are complete, Island Mountain will complete the cleanup necessary in the 30 runway homes using its own funds. Island Mountain will also invest funds for the transportation costs to move the homes to Eagle Valley Estates and about \$40,000 of its own funds to renovate the homes (an investment of \$1,200,000). As the homeowner's pay off their mortgages, Island Mountain will reinvest those funds into similar projects on the Reservation.
- ii. Use of Existing Infrastructure: The current water and sewer systems are not large enough to support the full buildout of the subdivision. The waterlines are old, and the current treatment system does not have the capacity to treat the amount of water anticipated. As such, the Eagle Valley Estates development includes increasing the capacity of the current water treatment system and installing new water mains. The Tribal Housing Authority plans to apply for a HUD Community Development Block Grant to cover infrastructure costs. In addition, Operation Walking Shield is working to receive additional earth work assistance through the Department of Defense's Innovative Readiness Training Program. Upgrading the infrastructure in the Fort Belknap Agency is also needed to protect water quality. Water quality is a regular concern for the community. Most recently, in January 2019, there was a 4-day boil order due to low water pressure allowing fecal material and bacteria to infiltrate the pipes through cracks.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

⁴ <https://www.dvidshub.net/news/179000/runnin-roos-bring-hope-fort-belknap>

i. The Community's Need for Funding: A brownfields assessment grant would fill the gap in funding needed to continue moving forward with the Eagle Valley Estates development. Neither FBCEDC nor the Fort Belknap Indian Community has funds to dedicate to brownfields assessment. There are about 3,000 tribal members living on the Reservation limiting financial resources. The Fort Belknap Reservation has very few retail establishments, and most of the wages earned on the Reservation are spent in neighboring towns, off the Reservation. The Fort Belknap Indian Community is a very low-income population as well as an aging population limiting the number of people in the workforce. The median age on the Reservation is 64 while the median age for Montana is 40. The per capita income is \$12,330 per year while the Montana per capita income is \$22,216 per year¹. The Fort Belknap Indian Community continues to be challenged with a poverty rate of 41% and more than half of children under 18 live in poverty (53%). To further complicate things, Tribal resources have been significantly strained by the on-going costs incurred to make the necessary repairs and the replacement of major roadways, sanitary facilities, and community buildings that were damaged by the spring 2018 flooding. The Montana governor declared a flooding emergency when much of the land in north central Montana, including the Reservation, flooded due to a large and quick snow melt.

ii. Threats to Sensitive Populations

1. *Health or Welfare of Sensitive Populations:* The Fort Belknap Indian Community suffers from a number of health and welfare disparities, specifically for their sensitive populations. Pregnant women and teens on the Reservation find themselves with underserved medical needs and often see a doctor later in their pregnancy than others in Montana (65% of Fort Belknap pregnancies versus 83% of all pregnancies)⁵. This is partially due to the lack of prenatal care on the Reservation. The Indian Health Services clinic has a difficult time with staffing and does not provide many much-needed services including prenatal care and delivery services. The closest clinic for prenatal care is in Havre 47 miles from the closest point on the Reservation. If there are any complications with a pregnancy, a woman must travel 100 miles to the nearest clinic that provides high risk prenatal services. The teen birth rate for American Indians in Montana is 78 per 1000 teen females compared to only 25 per 1000 teen females for all Montana teen females.⁶ Even worse, the infant mortality rate (deaths per 1,000 live births) for American Indian Women in Montana is 13.7 while it is 5.9 for all Montana women⁷.

Quality and safe housing is vital to health and welfare of tribal members. The waiting list for housing on the Reservation includes more than 300 families and another 200 homes are overcrowded. Overcrowding and poor-quality housing have a direct relationship to poor mental health, developmental delay, and heart disease⁸. Heart disease death rates for American Indians in Montana is 424 per 100,000 population compared to 297 per 100,000 population for all of Montana⁹. The Montana American Indian suicide rate is about 28.5 deaths per 100,000 people,

⁵ <http://www.montanakidscount.org/wp-content/uploads/2016/06/Reclaiming-American-Indian-Maternal-and-Child-Health.pdf>

⁶ Kids Count Data Center, Montana, Teen births by race and ethnicity, 2015.

⁷ Kids Count Data Center, Montana, Infant mortality by race and ethnicity, 2016.

⁸ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC322229/>

⁹ <https://dphhs.mt.gov/publichealth/cardiovascular>

as compared to 13.9 per 100,000 for the U.S. population¹⁰. Additionally, Native American youth in Montana die from suicide at a rate five times higher than other groups between ages 11 to 24 statewide¹¹. The runaway homes sit vacant but transients have nowhere else to go to protect themselves from the harsh winters in Montana. These people are potentially exposed to asbestos, lead, and meth residues. It is also likely some are smoking meth in the homes. In 2016, the Fort Belknap Indian Community declared a State of Emergency related to methamphetamine and other dangerous drugs. Indian Health Service officials estimate that between 2011 and 2015, dependence on meth and other psychostimulants more than tripled for tribal members in Montana¹². Assessing and cleaning up the runaway homes will allow families to have safe housing and improve their overall health.

2. *Greater Than Normal Incidence of Disease and Adverse Health Conditions:* The population of the Fort Belknap Indian Community has a greater than normal rate of cancer. The rate of cancer diagnosis (all types per 100,000 people from 2006 to 2015) in the Fort Belknap Indian Community is 564, higher than the Montana rate of 457. Lung cancer is the most common type of cancer diagnosed.¹³ Lack of healthy housing may contribute to this rate as residents are exposed to asbestos used in the building of their residences. The primary contaminant of concern in the runaway homes is asbestos, a known carcinogen that can lead to lung cancer. By assessing the runaway homes and conducting any necessary cleanup, we will provide asbestos-free housing to 30 families who may currently be homeless, living in insufficient housing facing possible chemical exposures, or living in overcrowded homes.

Vacant homes provide an easy location for alcohol and drug use. Alcohol and drugs run rampant on Montana Reservations. American Indians and Alaska Natives are six and a half times more likely to die from alcohol-related illness than any other U.S. races; almost three times as likely to die from diabetes and twice as likely to be murdered or die unintentionally, according to IHS mortality disparity rates.¹⁴ By assessing, cleaning up, and renovating the runaway homes, there will be less vacant homes on the Reservation, reducing the places for illegal activities to occur.

3. *Economically Impoverished/Disproportionately Impacted Populations:* The Fort Belknap Indian Community has been deeply affected by mining impacts to their water. The former Zortman-Landusky gold mine adjacent to the Fort Belknap Reservation. The USDA Natural Resource Conservation Service considers the Zortman-Landusky area one of only seven areas in Montana as an environmental justice community due to pollution of mine tailings.¹⁵ More than a dozen cyanide spills occurred during the life of the mine from 1979-1988, including one spill that released 50,000 gallons of cyanide solution, contaminating a domestic water supply on the Reservation. In the early 1990s the State of Montana, the Fort Belknap Tribes and EPA filed suits against Pegasus Gold for impacts to water resources due to long-term water quality

¹⁰ <https://dphhs.mt.gov/Portals/85/suicideprevention/SuicideinMontana.pdf>

¹¹ <http://nativenews.jour.umont.edu/2017/reaching-out-flathead/>

¹² <http://metheffect.com/ReservationTreatment-Solutions.html>

¹³ https://dphhs.mt.gov/Portals/85/publichealth/documents/Cancer/C_Data%20%26%20Statistics/Reservation_Fact%20Sheet_update10.3.17.pdf

¹⁴ http://nativenews.jour.umont.edu/2013/?page_id=24

¹⁵ https://www.nrcs.usda.gov/wps/portal/nrcs/mt/about/civilrights/nrcs144p2_057864/

violations, including cyanide, acids and metals. Pegasus Gold, is now bankrupt and there is limited funding to continue water treatment indefinitely, which is the only treatment option. Multiple streams in the Little Rocky Mountains continue to be polluted with metals from acid mine drainage. Health problems from asthma and emphysema to thyroid problems and diabetes have been on the rise on the Fort Belknap Reservation for the past 25 years, especially among children. Other health impacts possibly associated with the former gold mining, such as lead poisoning and chemical burns from swimming in the water that flows out of the mining area, have also been reported.¹⁶

Lack of clean drinking water has also impacted the Fort Belknap Indian Community for decades. Until 2015, the intake for the community water supply system was in the Milk River, downstream of where Harlem discharged its sewer treatment facility effluent. The Fort Belknap Agency water treatment plant was designed in 2008 but was out of compliance with EPA Disinfection Byproducts regulation since the time it was built.¹⁷ In 2015, the water treatment facility was upgraded to be in compliance with EPA regulations but still does not have the capacity to adequately serve the residents of Fort Belknap Agency. Residents continue to have problems with water as a water boil order was issued in January 2019 due to low water pressure allowing contaminants in to the water lines. Part of the Eagle Valley Estates development is to increase the capacity of the water treatment facility, not only positively impacting Eagle Valley Estates residents but helping provide clean water for the entire community.

b. Community Engagement

i. Community Involvement: The table below lists our active partners for the Eagle Valley Estates Development.

Partner Name	Point of Contact	Role in Project
Island Mountain Development Group	Sean Henderson, (406) 673-3031 sean.henderson@islandmntn.com	<ul style="list-style-type: none"> • Purchasing runway homes and renovating. Total investment is about \$1.35 million. • Mortgage financing for new homebuyers.
Tribal Historic Preservation Office	Michael Black Wolf, (406) 353-2295 mblackwolf@ftbelknap.org	<ul style="list-style-type: none"> • Conduct historical evaluation of subdivision land.
Fort Belknap Housing Authority	Harlan Mount, (406) 353-2601 hmount@fbtha.org	<ul style="list-style-type: none"> • Funds for site preparation. • Connect qualified home buyers to housing.
Fort Belknap Environmental Office	Ina Nez Perce, (406) 353-8429 inperce@ftbelknap.org	<ul style="list-style-type: none"> • Redevelop center property as greenspace and solar power generation.
Opportunity Link	Barbara Stiffarm, (406) 265-3699 bstiffarm@opportunitylinkmt.org	<ul style="list-style-type: none"> • Connect homeowners to the local transit system. • FBCEDC community outreach meetings.
Prairie Mountain Utilities	Raymond King, (406) 353-8313	<ul style="list-style-type: none"> • Infrastructure design and installation and oversee the water treatment fund.
Transportation Department	C. “John” Healy, Sr., (406) 353-2447 jhealy@ftbelknap.org	<ul style="list-style-type: none"> • Operation Walking Shield volunteers for road construction.

¹⁶ https://earthworks.org/publications/cyanide_heap_leach_packet/

¹⁷Water Is Life Project, National Tribal Water Center 2015

Operation Walking Shield	Marvin Thurman, (657) 900-2197 mthurman@walkingshield.org	<ul style="list-style-type: none"> • Site preparation via Department of Defense's Innovative Readiness Training program.
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ii. **Incorporating Community Input:** To garner the greatest community interaction, FBCEDC will hold at least four community meetings to communicate progress on the grant and receive input from residents. We will advertise meetings in the Blaine County Journal and on the radio. Meetings will be held at the senior citizen center and be coordinated with tribal council meetings. We have found these to be the best places to reach the largest audience and in turn obtain the most feedback. All public meetings will accommodate hearing and sight concerns as needed through large print publications, sign language interpretation, and use of ADA accessible facilities. Notes will be taken at all meetings, with comments recorded in the minutes. All comments will be reviewed and considered and a response will be provided for all comments and sent to the individual who raised the comment or question. We will create two fact sheets to describe the assessment and abatement processes as well as one brochure explaining the assessment grant and general project scope. We will add a webpage to our current website (<https://www.fortbelknapcedc.org/>) to feature the most up to date information. We will also schedule two interviews on 88.1 The Buckskin Voice, the local radio station. All communication will be in the English language as it is the primary language on the Reservation, although if the need arises, communication can be translated to the White Clay native language.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks and Activities

Contractor Procurement (FBCEDC Lead) - Within two months of award, we plan to issue a Request for Proposals (RFP) for a Qualified Environmental Professional (QEP). The RFP will be based on our approved EPA workplan and grant deliverables. Submitted proposals will be reviewed and scored by our Executive Director and Board of Directors. Once proposals are reviewed, the top firms will be interviewed and we will select the firm(s) that best meet the selection criteria as outlined in the RFP.

Cooperative Agreement Oversight (FBCEDC Lead) – FBCEDC staff will be responsible for hiring an environmental contractor; updating the Board of Directors on progress quarterly; coordinating with Island Mountain; working with other landowners and developers; coordinating with EPA and the Tribes; updating Assessment, Cleanup and Redevelopment Exchange System (ACRES) quarterly; preparing 12 EPA quarterly reports; facilitating site access with access agreements signed; attending two brownfields conferences; and general grant management. Island Mountain will donate the time of two of its employees, one project director and the chief financial officer to contribute to the oversight of the cooperative agreement. We estimate these in-kind services at \$30 per hour for a combined 600 hours totaling an \$18,000 contribution.

Community Outreach (FBCEDC Lead) – This task includes preparing a community outreach plan within two months of grant award, advertising and planning 4 public meetings, preparing 2 educational fact sheets; creating and maintaining brownfields information on the FBCEDC website (fortbelknapcedc.org); and conducting 2 radio interviews.

Site Assessment (QEP Lead) – Assessments will begin within 6 months after award date and will be completed 3 months prior to grant expiration. A quality assurance project plan and at least one sampling and analysis plan will be developed and approved by EPA. The QEP will assist

FBCEDC with the development of a site eligibility form to be submitted to EPA for review. We do not anticipate completing any phase I site assessments as the real property is remaining in the ownership of the Tribes and not transferring. Island Mountain's purchase of the buildings (not land) is not contingent upon phase I assessments. A phase II site assessment will be completed on the 30 runway homes as well as other homes throughout the Reservation if funds remain. A report of findings will be completed with site data compared to cleanup standards for each of the homes assessed.

Cleanup Planning (QEP Lead) – The QEP will be responsible for identifying cleanup options and costs; identifying redevelopment options based on site data and community input; and working with the owner/developer on a cleanup plan. One large cleanup plan will be created that includes cleanup requirements for each the runway homes assessed.

All grant tasks will be completed within three years. After selection of the QEP, the quality assurance project plan and sampling and analysis plans will be completed. We expect in the field assessment efforts to begin approximately six months following award to allow time for EPA review and approval of documents. Within 18 months of award, all 30 homes should be assessed. At that time, we will evaluate if there are remaining funds to assess other properties throughout the Reservation. After the final reports are complete, cleanup planning tasks will begin for the homes that will need cleanup.

b. Cost Estimates and Outputs: The following table reflects our budget breakout by task with 91% of the grant funding going toward direct costs for community education, assessment, and cleanup planning.

PROJECT BUDGET					
Budget Categories	Project Tasks				
(Hazardous Substance Funds)	Cooperative Agreement Oversight	Community Outreach	Site Assessment	Cleanup Planning	Total
Personnel	\$15,000	\$7,000			\$22,000
Fringe Benefits ¹	\$4,500	\$2,100			\$6,600
Travel ²	\$6,000				\$6,000
Supplies	\$500				\$500
Contractual ³		\$8,000	\$246,900	\$10,000	\$264,900
Total Direct Costs	\$26,000	\$17,100	\$246,900	\$10,000	300,000
Total Indirect Costs					-
OVERALL TOTAL	\$26,000	\$17,100	\$246,900	\$10,000	\$300,000

¹ Calculated at a rate of 30% of personnel expense.
² Travel to Brownfields-related training conferences.
³ Applicants will comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48.

The following explains how costs shown in the project budget table were developed. Outputs are denoted with an asterisk (*).

Personnel – Personnel costs were calculated at a rate of \$30/hour for 500 hours of cooperative agreement oversight to total \$15,000. We calculated personnel time spent on community outreach at a rate of \$30/hour for approximately 233 hours totaling \$7,000. Personnel costs will allow us to complete outputs such as: hiring an environmental contractor*; updating the FBCEDC board on progress quarterly*; 2 radio interviews*; 4 public meetings*; updating ACRES quarterly*; and preparing 12 EPA quarterly reports* during the three-year grant cycle.

Fringe Benefits – Fringe benefits were calculated at a rate of 30% of personnel expense.

Travel – Travel was based on travel to one national Brownfields conference* and one regional conference* for two employees. National conference: \$1,500 per person for 2 people = \$3,000. Regional conference: \$1,000 per person for 2 people = \$2,000. Travel for community outreach was estimated at approximately \$1,000 for gas and vehicle use for 4 public meetings*.

Supplies: Supplies were estimated at \$500 for paper printing costs for brochures* and 2 fact sheets* about our brownfields program.

Contractual: Contractual costs for community outreach were estimated at \$1,000/public meeting, for 4 meetings* totaling \$4,000. An additional \$1,000 was set aside for assistance with preparing 2 fact sheets* (\$500/each) and \$1,000 to create a programmatic brochure*. The remaining \$2,000 is budgeted for the QEP's assistance with landowner meetings* to discuss the brownfields process and review reports of findings with the landowners and Tribal government for a total of \$8,000 for community outreach. Contractual costs for site assessment were estimated at \$246,900 which includes: \$5000 for one Quality Assurance Project Plan; one sampling and analysis plan that will include all 30 runway homes for \$30,000; one phase II site assessment that will include all 30 runway homes at \$181,900; and one report of findings that will show the results and cleanup requirements for all 30 homes at \$30,000. Contractual costs for cleanup planning are estimated at \$10,000.

c. Measuring Environmental Results: FBCEDC will evaluate performance of the contract agreement workplan each quarter through quarterly reports and ACRES and will discuss any obstacles with the EPA project officer. FBCEDC and the EPA project officer will develop a plan to overcome the obstacle and achieve the desired outcome in its workplan. Because FBCEDC and Island Mountain are associated with the Fort Belknap Indian Community, they will have the ability to closely track homes assessed, abated, renovated, and resold as well as how many jobs are created and mortgages originated. FBCEDC is confident assessments will be completed within the 3-year grant timeline. Final outcomes of the Eagle Valley Estates project include: fewer families on the housing waiting list, more residents owning homes, use of the airport runway for emergency services, leveraged funding for redevelopment, a reduction in environmental risks, and homes free from lead, asbestos and/or meth residues.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

- i. Organizational Structure: Established in 2014, FBCEDC is fully qualified to manage a brownfields assessment grant. FBCEDC was created by the Fort Belknap Indian Community Council to build a strong Fort Belknap Indian Community through business, entrepreneurship, and community development. We have two full-time employees and an active six-member board

of directors. Island Mountain donates the time of one of its staff members one day a week to work for FBCEDC and will donate additional staff time for financial services.

Leslie “Josie” Cliff has been the executive director of FBCEDC since June 2016. Josie holds a business associates degree from Aaniiih Nakoda College and a bachelor’s degree from Montana State University. She was the project director for the Red Paint Creek Store and Trading Post and her tasks included managing multiple grants from various funding sources. Josie will be the day to day lead for the brownfields assessment grant. Loren ‘Bum’ Stiffarm is the Research and Development Officer for Island Mountain and donates 8 hours of his time per week to FBCEDC. He attended Haskell Indian Junior College and Eastern Montana College. Bum served as the chief administrative officer of the Fort Belknap Indian Community Council from 2005 through 2014. Bum has managed millions of dollars in federal, state, and private funding projects and will oversee the brownfields assessment grant activities. Dana Pyette is the Chief Financial Officer for Island Mountain and on the FBCEDC Board of Directors. Island Mountain will donate Dana’s time to manage the financial aspects of the grant. She holds a bachelor’s degree in Business Administration, with a minor in accounting from Montana State University - Northern and Master of Business Administration from Marylhurst University.

ii. Acquiring Additional Resources: In the case of employee turnover, Island Mountain will donate staff time until FBCEDC is able to hire new staff. Island Mountain has additional staff experienced in grant management, marketing, and federal loan programs that could successfully carryout management of the grant. FBCEDC will select a QEP to assist with community outreach and conduct assessments and cleanup planning. We will procure the QEP in accordance with tribal and federal laws contained in 40 CFR 30 or 31.

b. Past Performance and Accomplishments

i. Has Not Received an EPA Brownfields Grant

1. *Purpose and Accomplishments:* FBCEDC has managed more than \$1.1 million dollars in funding since it was created in 2014. Our largest grant was \$348,703, awarded in September 2014 from the US DHHS Office of Community Services to help launch the Red Paint Creek Trading Post & Pantry. These funds are also designated to open a food bank that is located at the Trading Post. The food bank will open in February 2019. All funds will be expended by the end of the grant period in September 2019. With this funding we have leveraged \$635,941, created 2 businesses and will create a total of 14 jobs. The next largest was \$317,000 from through the USDA Rural Business Enterprise Grant in 2014 for construction of a grocery store. That construction was complete in 2018 and all funds have been expended. Most of the remaining \$436,000 we have received in funding has been from private foundations.

2. *Compliance with Grant Requirements:* For both our US DHHS and USDA grants we have met all grant requirements to date. We have submitted reports on time and tracked outputs and outcomes. All funds from the USDA grant have been drawn and all funds will be drawn from the US DHHS funding by the end of the grant period which is September 2019.

Attachment A

Documentation of Applicant Eligibility

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: JUL 29 2015

FORT BELKNAP COMMUNITY ECONOMIC
DEVELOPMENT CORPORATION
C/O SAM S PAINTER
176 SOUTH 32ND STREET WEST SUITE 4
BILLINGS, MT 59102-6867

Employer Identification Number:

(b) (6)

DLN:

(b) (6)

Contact Person:

JOSEPH R KENNEDY

(b) (6)

Contact Telephone Number:

(877) 829-5500

Accounting Period Ending:

December 31

Public Charity Status:

170(b)(1)(A)(vi)

Form 990 Required:

Yes

Effective Date of Exemption:

July 7, 2014

Contribution Deductibility:

Yes

Addendum Applies:

No

Dear Applicant:

We are pleased to inform you that upon review of your application for tax exempt status we have determined that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code. Contributions to you are deductible under section 170 of the Code. You are also qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Code. Because this letter could help resolve any questions regarding your exempt status, you should keep it in your permanent records.

Organizations exempt under section 501(c)(3) of the Code are further classified as either public charities or private foundations. We determined that you are a public charity under the Code section(s) listed in the heading of this letter.

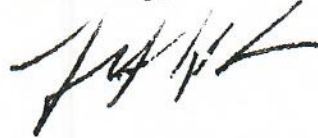
For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Letter 947

FORT BELKNAP COMMUNITY ECONOMIC

We have sent a copy of this letter to your representative as indicated in your power of attorney.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. I. Cooper', with a stylized flourish at the end.

Jeffrey I. Cooper
Director, Exempt Organizations
Rulings and Agreements

Attachment B

Description of Community Involvement

Fort Belknap Community Economic Development Corporation Threshold Criteria

Community Involvement

Fort Belknap Community Economic Development Corporation (FBCEDC) understands the importance of involving stakeholders in all of its projects including brownfields assessments. FBCEDC plans to inform and involve the community and other stakeholders throughout the brownfields assessment and redevelopment processes. We plan to develop a Community Outreach and Education Plan to guide our public and community participation. We will educate our citizens and provide opportunities to learn more about the brownfields program and provide a forum to address concerns.

At least four public meetings will be held during the grant period to update the community of the Phase II findings after assessment. We will hold meetings at the senior centers and in conjunction with Fort Belknap Community Council meetings. We have found these are the best places to reach the widest audience. Two educational fact sheets will be developed to describe the assessment and cleanup processes. We will also develop a program brochure describing our brownfields program. We will reach out to the Blaine County Journal (local newspaper) and 88.1 The Buckskin Voice (local radio station) to provide information to highlight progress made on specific sites undergoing assessment. We also plan to schedule two radio interviews. Residents will be encouraged to provide verbal and/or written input to FBCEDC. Input will then be discussed and we will respond to comments or concerns in writing or with a one-on-one stakeholder meeting.

The following actions outline FBCEDC's community outreach efforts under this grant:

1. Community Outreach Plan
2. Prepare educational fact sheets about the assessment and cleanup processes
3. Create a brownfields program brochure
4. Work closely with the Tribal government
5. Create and update brownfields webpage on FBCEDC's website
6. Engage local newspaper and radio station
7. Hold public meetings and one-on-one meetings with interested stakeholders

Attachment C

Affirmative Statement of No Assessment Grant

**Fort Belknap Community Economic Development Corporation
Threshold Criteria**

Balance

FBCEDC does not have an active Assessment Grant.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/29/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

FORT BELKNAP COMMUNITY ECONOMIC DEVELOPMENT CORPORATION

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

(b) (6)

d. Address:

* Street1:

143 ASSINIBOINE AVE

Street2:

* City:

HARLEM

County/Parish:

BLAINE

* State:

MT: Montana

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

59526-1177

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms .

* First Name:

LESLIE

Middle Name:

* Last Name:

CLIFF

Suffix:

Title:

EXECUTIVE DIRECTOR

Organizational Affiliation:

* Telephone Number:

406-353-4260

Fax Number:

* Email:

leslie.cliff@fbcedc.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

FY19 BROWNFIELDS ASSESSMENT GRANT

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: